

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS.
2005 JAN 25 P 3:30

JACQUELINE LASSITER

U.S. DISTRICT COURT
DISTRICT OF MASS.
PLAINTIFF'S R.26(a)(3) DISCLOSURE

v.

KIMBER ANDERSON ET AL

The Plaintiff makes the following disclosures, pursuant to FRCP 26(a)(3):

A. PLAINTIFF'S EXPECTED WITNESSES:

Kimber Anderson-Defendant
Brian Gibbs-Defendant
Jane Gervais-Defendant
Treasurer-Fleet National Bank
Benefits Coordinator-Fleet National Bank
Director of Human Resources-Fleet National Bank
Keeper of Records-MCAD
Keeper of Records-South Community Health Center, 1601 Washington St., Boston
Dr. Johnnie Hamilton-Mason-1601 Washington St., Boston, Ma.
Henry Lassiter-22 Frontenac St., Dorchester, Ma.
Jacqueline Lassiter-Plaintiff
Kayon Kerr-7 Vaughan Avenue, Boston, Ma. 02121
Mark Averill-18 Windemere Rd., Boston, Ma. 02125

Plaintiff expects to call any or all of these witnesses. Plaintiff reserves the right to amend and supplement this list.

B. WITNESSES BY DEPOSITION

Plaintiff hereby indicates that in the event of the unavailability of witnesses associated with the defendant Fleet Bank or of any of the individually named defendants, that she intends to rely on their deposition testimony taken in discovery in this litigation.

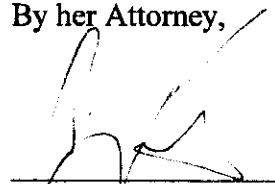
D. PLAINTIFF'S PROPOSED EXHIBITS:

1. Excerpts from Plaintiff's Personnel File
2. Defendant's Policies on: Attendance & Punctuality and Teller Standards
3. Defendant's Policy on retention of Teller Tapes.
4. Time Sheets

5. Managers' Guide
6. Policy on Resolution of Employee Grievances
7. Defendant's Policy on Discipline and Termination
8. Plaintiff's Application for Training Specialist II
9. Correspondence from Plaintiff to defendant: Request For Supplementation of Request For Production; Request for Correction/Amendment to personnel files; Request for information on Pam LNU
10. Plaintiff's mental health treatment records and Report from Dr. Johnnie Hamilton-Mason, South End Community Health Center
11. Resume and Curriculum Vitae of Dr. Hamilton-Mason
12. Excerpts from Fleet's Employee Handbook
13. Excerpts from defendant's Answers to plaintiff's Interrogatories
14. Excerpts from defendant's Answers to plaintiff's Request For Production
15. Excerpts from filings at MCAD in Lassiter v. Anderson et al.
16. Salary history for the position of TS II
17. Tax returns of defendant Gibbs
18. Tax returns of defendant Anderson
19. Excerpts from the deposition transcripts of defendants

Plaintiff reserves the right to amend and to supplement this list.

Plaintiff,
By her Attorney,



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